

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICKY GRAHAM, SULEANER SIPP, and JERMAINE SIPP,)	
)	
)	
Plaintiffs,)	
v.)	Case No. 08 C 889
)	
JOHN P. DOLAN, CRAIG A. DUNDERDALE,)	Judge Ronald A. Guzman
KEITH E. KARCZEWSKI, VERNON)	
MITCHELL, JR., SCOTT M. WOLFF,)	Magistrate Judge Martin C. Ashman
MATTHEW P. CLINE, DANIEL J. DE LOPEZ,)	
EDDIE M. YOSHIMURA, UNKNOWN)	
NUMBER OF UNNAMED OFFICERS OF THE)	
CHICAGO POLICE DEPARTMENT, and)	
CITY OF CHICAGO,)	
)	
Defendants.)	

INITIAL JOINT STATUS REPORT AND PROPOSED DISCOVERY SCHEDULE

1) Attorneys of record for each party.

Irene K. Dymkar, 300 W. Adams, Suite 330, Chicago, Illinois 60606-5107, is the attorney of record for plaintiffs, RICKY GRAHAM, SULEANER SIPP, and JERMAINE SIPP.

Schneur Z. Nathan, City of Chicago, Department of Law, 30 N. LaSalle, Suite 1400, Chicago, IL 60602, is the attorney of record for defendants JOHN P. DOLAN, CRAIG A. DUNDERDALE, KEITH E. KARCZEWSKI, VERNON MITCHELL, JR., SCOTT M. WOLFF, MATTHEW P. CLINE, DANIEL J. DE LOPEZ, and EDDIE M. YOSHIMURA.

Timothy L. Swabb, City of Chicago, Department of Law, 30 N. LaSalle, Suite 1020, Chicago, IL 60602, is the attorney of record for defendant CITY OF CHICAGO.

2) Basis for federal jurisdiction. Jurisdiction is based upon 28 U.S.C. §§ 1331, 1343, and 1367.

3) Nature of claims and counterclaims: This is an action brought under the Civil Rights Act of 1871 (42 U.S.C. § 1983) and 28 U.S.C. § 2201, to redress deprivations of the civil rights of plaintiffs through acts and/or omissions of defendants committed under color of law. Plaintiffs allege defendants deprived him of their rights under the Fourth and Fourteenth Amendments and have also alleged supplemental Illinois claims

4) Parties' proposed discovery/motion schedule:

- A. All disclosures required by Rule 26(a)(1) to be made on or before May 6, 2008.
- B. Any motion to amend complaint or add parties to be brought by September 2, 2008.
- C. The cutoff for fact discovery to be October 14, 2008.
- D. The parties do not anticipate retaining the services of an expert. Should any party determine that the services of an expert are needed, that party will move the Court for an adjustment of the discovery schedule.
- E. Any dispositive motions to be filed on or before November 13, 2008.

5) Trial. The parties have requested a jury trial and anticipate that it will last 3 - 4 days. This case will be ready for trial 30 days after the Court renders its decision on any summary judgment motions.

6) Whether the parties consent to proceed before a Magistrate Judge: The parties do not consent to proceed before a Magistrate Judge at this time.

7) Status of settlement discussions: Parties believe they cannot engage in meaningful settlement negotiations until there is at least some discovery.

Dated: April 11, 2008

Respectfully submitted,

/s Irene K. Dymkar
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